

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WHEELER ZAMICHIELI	:	CIVIL ACTION
Plaintiff,	:	
	:	JUDGE GREGORY M. SLEET
vs.	:	NO. 12-3200
	:	
WILLIAM ANDREWS, et al.,	:	
Defendants,	:	

PLAINTIFF'S MOTION TO COMPEL INTERROGATORIES AND
PRODUCTION OF DOCUMENTS BY DEFENDANTS WILLIAM
ANDREWS, MELVIN VICTOR, AND RONALD DOVE

Plaintiff Wheeler Zamichieli, on this 13th day of August, 2015, moves this Honorable Court for an order pursuant to Rule 37(a) of the Federal Rules of Civil Procedure compelling Defendants [William Andrews, Melvin Victor, and Ronald], who failed to answer Plaintiff's interrogatories and Request for Production of Documents.

Plaintiff submitted the aforementioned motion pursuant to Rule 33 and 34 of the Federal Rules of Civil Procedure on June 15, 2015 upon defendant's, but have not received any response. See Sworn Declaration of Plaintiff, Exhibit A attached.

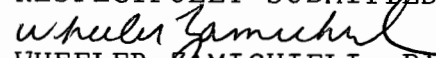
The Plaintiff also moves for an order pursuant to Rule 37 (a)(4) requiring the aforesaid defendants to pay Plaintiff reasonable expenses in obtaining this order, on the grounds that defendants

refusal to answer interrogatories or produce the documents had no substantial justification.

Wherefore, Plaintiff respectfully asked this Honorable Court to Compel Interrogatories and Production of Documents by Defendants, ordering reasonable expenses in obtaining this Order.

DATE: AUGUST 13, 2015

RESPECTFULLY SUBMITTED


WHEELER LAMICHELII, Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WHEELER ZAMICHIELI : CIVIL ACTION
Plaintiff, :
vs. : JUDGE CRECORY M. SLEET
NO. 12-3200
:
WILLIAM ANDREWS, et al., :
Defendant(s) :

SWORN DECLARATION

I, Wheeler Zamichieli, Plaintiff hereby verify, certify, and swear that, Interrogatories And Request For Production Of Documents Directed To: William Andrews, Melvin Victor, and Ronald Dove was served (individually) by U.S. Mail, to Assistant City Solicitor Demitrios Mavroudis on June 15, 2015. Federal Detention Center of Philadelphia [Log Book] Records will verify proof of Plaintiff's mailing. As to date, civil defendant(s) has not responded to Plaintiff's requests.

Prior to serving Mavroudis by U.S. Mail, Plaintiff attempted to filed the afore-mentioned Request, via Electronic Case Filing System "ECF," but U.S. Deputy Clerk James Deitz returned Plaintiff's Discovery Documents on June 12th and 15th of 2015, stating, "Local Rule 26.1 obviated the need for filing discovery documents."

Any false statements made herein, are subject to the penalties of perjury, 28 U.S.C. § 1746.

Executed on this 13th day of August, 2015.

CERTIFICATE OF SERVICE

I hereby certify that, a true and correct copy of the following: Plaintiff's Motion To Compel Interrogatories And Production Of Documents by Defendant's William Andrews, Melvin Victor, and Ronald Dove, has been served upon the person listed below, by U.S. Mail addressed as follow.

ASSISTANT CITY SOLICITOR

DIMITRIOS MAVROUDIS

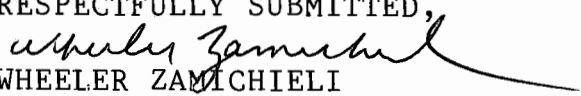
1515 ARCH STREET

CIVIL RIGHTS LAW DEPT., 14th FL.

PHILA, PA. 19102

DATE: AUGUST 13, 2015

RESPECTFULLY SUBMITTED,


WHEELER ZAMICHEL I

INST#67271-066

FDC PHILA

P.O. BOX 562

PHILA, PA. 19106

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

WHEELER ZAMICHIELI	:	CIVIL ACTION
Plaintiff,	:	
	:	JUDGE GREGORY M. SLEET
vs.	:	NO. 12-3200
	:	
WILLIAM ANDREWS, et al.,	:	
Defendants,	:	

ORDER

RECEIVED
AUG 17 2015

AND NOW, this day of , 2015, upon
consideration of Plaintiff's Motion To Compel Interrogatories
And Production Of Documents By Defendants William Andrews,
Melvin Victor, And Ronald Dove, it is hereby ORDERED that
the motion is GRanted. The Municipal Defendant's shall dis-
close to Plaintiff the aforementioned documents immediately.

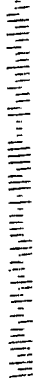
BY THE COURT:

GREGORY M. SLEET, J.



U.S.M.S.
X-RAY

UNITED STATES DISTRICT COURT
MICHAEL KUNZ, CLERK OF COURT
U.S. COURTHOUSE
601 MARKET ST.
PHILA, PA. 19106



WHEELER ZAMICHAEL
#67271-066
FEDERAL DETENTION CENTER
P.O. BOX 562
PHILA, PA 19106

MAIL ON 8/13/15
W.J.

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LEGAL MAIL
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